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April 14, 2016

VIA HAND DELIVERY

Honorable Judge Leonard P. Stark
Chief Judge
United States District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Unit 26, Room 6124
Wilmington, DE 19801

Re: Martin v. Zirtual Inc., Case No. 1:15-cv-00701-LPS

Dear Judge Stark:

My firm is Delaware counsel to Plaintiff Felice Martin in the above-referenced action.

I write to respectfully request that the Court enter the enclosed protective order and to explain the circumstances requiring the entry of same.

Plaintiff filed her Complaint on August 11, 2015. Defendant Zirtual Inc. ("Zirtual"), never appeared, answered, or otherwise moved with respect to the Complaint. On March 15, 2016, at Plaintiff's request, the Clerk entered a default against Zirtual.

During the pendency of the action, Plaintiff's counsel learned that Zirtual had assigned its assets to CMBG Advisors, Inc. ("CMBG") under California's assignment for the benefit of creditors law. Accordingly, Plaintiff's counsel issued and served a subpoena on CMBG requesting documents relating to the purchase of Zirtual's assets by another entity and copies of certain of Zirtual's insurance policies. CMBG has indicated that it would produce responsive documents after Plaintiff agreed to confidential treatment of those documents in accordance with the attached consensual form of order.

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Accordingly, Plaintiff respectfully requests that the Court enter the attached protective order.

Respectfully,

/s/ Christopher D. Loizides

Christopher D. Loizides (No. 3968)

cc: Jack A. Raisner, Esq.
René S. Roupinian, Esq.

Encl.